

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

In the Matter of:	)	
	)	
Review of Quiet Zones Application Procedures	)	WT Docket No. 01-319
	)	

To: The Commission

**REPLY COMMENTS OF VERIZON WIRELESS**

Cellco Partnership d/b/a Verizon Wireless hereby submits its reply comments in response to the Notice of Proposed Rule Making (“NPRM”) released by the Federal Communications Commission (“FCC” or “Commission”) on November 21, 2001, in the above-captioned proceeding.<sup>1</sup>

Verizon Wireless supports the Commission’s proposal to streamline its application processes prescribed by section 1.924, while continuing to ensure that the Quiet Zone rules are not compromised. Specifically, the Commission should (1) allow applicants to notify and coordinate with Quiet Zone entities prior to filing an application; (2) allow applicants that have completed coordination to initiate conditional operations simultaneous with the filing of an application; (3) eliminate the current 20-day waiting period for applications that have already been coordinated, and process applications by a streamlined public notice process. Enacting

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<sup>1</sup> *Review of Quiet Zones Application Procedures*, WT Docket No. 01-319, *Notice of Proposed Rulemaking*, FCC 1-333 (rel. Nov. 21, 2001).

these changes will enable the FCC to continue to protect Quiet Zones from harmful interference while eliminating delays in the authorization of new and modified facilities that are an integral part of our commercial mobile radio service (“CMRS”) system. The majority of the commenters, including Quiet Zone entities, supported enacting changes to reduce the regulatory burden on CMRS and Quiet Zone entities.

Verizon Wireless currently serves over 29 million CMRS customers. Its wireless network is comprised of thousands of microwave, cellular and PCS stations. These stations or authorizations operate in a manner that is seamless to the consumer, resulting in the largest wireless network in the United States. Delays in the processing of new and modified facilities place an *unnecessary* burden on CMRS operators. In the NPRM, the Commission proposes to modify section 1.924 of its rules to allow parties to provide notification to and begin coordination with Quiet Zone entities in advance of filing an application with the FCC. As the Commission noted, such a change “would help to expedite processing and the initiation of operations, while fully protecting the Quiet Zones.”<sup>2</sup> The vast majority of applications that are delayed as a result of the Quiet Zones procedures are for microwave authorizations. Nevertheless, Verizon Wireless urges the Commission, where applicable, to adopt the following changes for cellular and PCS as well as for microwave applications:

Section 1.924(a)(2) should be amended to allow applicants in any service to notify and coordinate with Quiet Zone entities prior to the submission of the FCC application. Currently the rule states that the application and notification “should be sent at the same time.”<sup>3</sup> In practice,

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<sup>2</sup> NPRM at 4.

<sup>3</sup> 47 C.F.R. 1.924(a)(2).

this requirement only delays the processing of an application and does not serve the interests of the Quiet Zone entities or the CMRS applicant. Prior notification will allow the applicant and the Quiet Zone entity to resolve the vast majority of interference issues without having to involve the Commission staff. Such a process would reduce the regulatory burden on both the applicant and Quiet Zone entity, save Commission staff valuable processing time, and expedite the provision of new wireless service.

Once the coordination is completed and an application for the new or modified station has been filed with the FCC, the applicant should automatically receive conditional authorization from the FCC. Conditional authorization should not require the FCC to take any action. The applicant's certification that it has satisfied the coordination requirement should be considered sufficient evidence that the coordination is complete. If necessary, the applicant could be required to file the approval of coordination letter that it would have received from the Quiet Zone entity.

Finally, the coordinated-application should be placed on a streamlined weekly public notice. At the end of the 20-day public notice period the conditional grant would become permanent. The streamlined public notice would serve as a public licensing record that the Commission has determined the conditional authorization to be final at the end of the 20-day period.


Verizon Wireless accordingly supports the Commission's proposal to amend its rules concerning Quiet Zones application procedures while maintaining the harmful-interference protection accorded to these areas. The FCC should amend its rules as described above to reduce the regulatory burden on CMRS applicants and speed the deployment of new wireless

service.

Respectfully submitted,

**VERIZON WIRELESS**

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February 6, 2002

**Certificate of Service**

I hereby certify that on this 6th day of February copies of the foregoing “Reply Comments of Verizon Wireless” in WT Docket 01-319 were sent by hand delivery to the following parties:

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A handwritten signature in black ink, reading "Sarah E. Weisman". The signature is written in a cursive style with a horizontal line underneath the name.

Sarah E. Weisman